

DATA MANAGEMENT INFORMATION

on the operation of an abuse-reporting system

Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report infringements of EU law and on the protection of individuals with regard to the processing of complaints, whistleblowing and whistleblowing and the rules relating to reporting of abuses 2023. Act (hereinafter referred to as the "Complaints Act") (hereinafter referred to as the "Complaints Act"): System) is jointly operated by MASTERPLAST Public Limited Company, MASTERPLAST Hungária Korlátolt Felelősségű Társaság, MASTERPLAST Medical Manufacturing and Trading Limited Liability Company, MASTERFOAM Manufacturing and Trading Limited Liability Company and MASTERPLAST International Limited Liability Company as the employing entities (hereinafter referred to as "Masterplast Complaints Handling Group") pursuant to the Complaints Act.

Masterplast Complaints Management Group, as the data controller (hereinafter referred to as the "Controller"), informs data subjects in this privacy notice (hereinafter referred to as the "Notice") about the data processing activities related to the operation of the system in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (hereinafter referred to as the "GDPR").

I) Definition:

The terms used in this Notice shall be defined in accordance with the provisions of the GDPR and the Complaints Act, as follows:

Data processing: any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data Controller: the legal person as defined in point II of this Privacy Notice.

Data processor: a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller, including in particular the Commission for the Investigation of Allegations of Abuse.

Whistleblower: someone who makes a report in good faith.

Employer: a person who employs a natural person under an employment relationship.

Personal data: any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Whistleblowing Investigation Committee: an organisational unit within the Masterplast Complaints Management Group that acts to ensure the fair investigation of whistleblowing, careful follow-up, protection of the whistleblower (and any third parties who may be affected by the whistleblowing) and fairness in the operation of the system. The Committee is composed of 3 members who elect a chairperson from among themselves.

II. The Data Controller

Name: Masterplast Complaints Handling Group¹

¹ Masterplast Nyrt., Masterplast Hungária Kft., Masterplast Medical Kft., Masterfoam Kft., Masterplast International Kft.

Office: 8143 Sárszentmihály, Árpád u. 1/A.

E-mail address: masterplast@masterplast.hu

Contact details of the Data Protection Officer: adatvedelem@masterplast.hu

III. Purpose and legal basis of the processing, data processed and data subjects

The Data Controller shall process personal data of the whistleblower, of the person whose conduct or omission gave rise to the whistleblowing and of the person who may have material information about the facts contained in the whistleblowing, to the extent necessary for the performance of its tasks in relation to the operation of the whistleblowing system, and to the extent necessary for the investigation of the whistleblowing and for the contact with the whistleblower.

Purpose of the processing:

To perform the tasks related to the operation of the Commission in accordance with the provisions of the Complaints Act.

Stakeholders:

- the notifier,
- the person whose conduct or failure to act gave rise to the notification (the person subject to the notification), and
- for the proper functioning of the Commission in the procedure under the Complaints Act, for the conduct of the procedure and its documentation and recording:
- the person who may have material information about the subject matter of the application (e.g. witness, expert)
- persons involved or implicated in the investigation of a Notification under the relevant internal rules.

Scope of the data processed:

The personal data that arise in connection with the Notification and its investigation and that are indispensable, in particular: the Notification's file number, unique registration number, data relating to the Notification (facts, time and manner of the Notification, the Notifier's identification data under the Complaints Act and contact details, the Notifier's Complaints Act 20.§ (2) of the Complaints Act (see under Concepts), data concerning the person concerned in the Complaint and the measures taken in the Complaint - as permitted by the Complaints Act, a description of the decisions on the merits and the measures taken.

Legal basis for processing:

The legal basis for the processing is Article 6 (1) (c) of the GDPR, and the processing is necessary for the fulfilment of a legal obligation to which the Data Controller is subject pursuant to the provisions of Article 26 of the Complaints Act.

IV. Duration of processing

Personal data not necessary for the investigation will be deleted by the Data Controller without delay.

The Data Controller shall delete the personal data from the investigation file without undue delay, but within 30 days at the latest, after the investigation has been completed, unless further action is taken on the basis of the investigation.

If proceedings are initiated on the basis of the notification, the Commission shall, as a rule, keep the notification and the personal data provided in the notification for 3 years, or, if the notification relates to a criminal offence, until the expiry of the limitation period for criminal liability (Act I of 2012, § 286 (2)).

V. Recipients of personal data, recipients in third countries

The employees of the controller who are involved in their tasks and therefore authorised to do so (members of the Abuse Reporting Committee) have access to your personal data.

The personal data contained in the notification may only be accessed by the Data Controller or its authorised employees, insofar as such access is necessary for the performance of their duties. The Data Controller shall only disclose the notifier's personal data to another department or employee of the employer if the notifier has given his or her written consent and to the extent strictly necessary for the investigation.

If it is established during the investigation that the whistleblower has provided false data or information in bad faith and is suspected of having committed a criminal offence or irregularity, the personal data must be disclosed to the body or person entitled to conduct the proceedings.

As a general rule, the Data Controller does not transfer data to third countries or international organisations. Such transfers of data processed under the internal whistleblowing system may only take place in exceptional cases, subject to a legal undertaking by the recipient of the transfer to comply with the rules on whistleblowing set out in the Complaints Act and subject to the provisions on the protection of personal data.

VI. Technical and organisational measures taken to ensure the security of data processing

The Data Controller has taken appropriate technical and organisational measures to ensure that the principles of data protection are implemented, that the requirements of the law are complied with, that the rights of data subjects are protected and that only personal data that are necessary for the specific purpose of processing are processed.

To this end, the Data Controller applies appropriate legal, administrative, physical and IT security measures. The Data Controller guarantees that its intermediaries who have access to personal data are bound by confidentiality obligations.

The Data Controller uses the following IT security solutions to ensure data security: virus protection, firewall, password protection.

VII. Rights of data subjects

Data subjects can exercise their rights in relation to data processing by contacting:

- orally, at their choice, on the dedicated telephone number +36 21/333 2052, which can also be used for sending voice messages and recording their voice,
- by post to 8143 Sárszentmihály, Árpád u. 1/A,
- via the dedicated Masterplast Complaints Management Group website www.masterplastgroup.com, either by providing your personal contact details or anonymously, at your choice.

The rights of the data subject may be exercised, only if the data subject is identifiable, in the manner provided for notification in this Notice. In the event of a notification, the Data Controller shall respond without delay and at the latest within 30 days, provided that the conditions for such notification are met.

Right of access: the data subject may request information from the controller about the purposes for which and the means by which his or her personal data are processed, to whom they may be disclosed, and may request a copy of the data stored by the controller

Pursuant to the relevant provision of the Complaints Act, in the exercise of the right to information and access, the personal data of the whistleblower as data subject shall not be disclosed to the person requesting the information.

Right to rectification: the data subject has the right to obtain, at his or her request and without undue delay, the rectification of inaccurate personal data relating to him or her, and the completion of incomplete personal data. It is in the best interest of the controller and the processors to keep accurate and up-to-date data about the data subject, and it is therefore necessary that the data subject informs the controller without delay of any changes to the data subject's data or of inaccurate or incorrect processing of the data.

The right to erasure: the data subject may request the controller to erase the personal data processed if the personal data are no longer necessary for the purposes for which they were collected or otherwise processed; if the data subject has withdrawn his or her consent and there is no other legal basis for the processing; where the data subject has objected to the processing and there is no overriding legitimate ground for the processing; or where the data subject considers that the personal data are unlawfully processed; or where the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject.

Right to restriction of processing: the data subject may request the restriction of processing if he or she contests the accuracy of the personal data processed; if the data subject considers that the personal data are unlawfully processed but opposes their erasure and requests instead the restriction of the use of the data; where the data subject considers that the personal data are no longer necessary for the purposes for which they were collected or otherwise processed, but the data subject needs them for the establishment, exercise or defence of legal claims; or where the data subject has objected to the processing (in which case the restriction shall apply for a period of time until it is established whether the legitimate grounds of the controller override the legitimate grounds of the data subject). In the case of restriction of processing, personal data other than storage may be processed only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the European Union or of a Member State.

The right to object: the data subject may object at any time, on grounds relating to his or her particular situation, to processing based on the legitimate interests of the controller. In the event of an objection, the controller may no longer process the personal data, unless he or she can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Right to judicial remedy: if the data subject considers that the processing of personal data concerning him or her infringes the provisions of the GDPR or the data protection legislation in force, he or she may lodge a complaint with the competent supervisory authority in the Member State of his or her habitual residence, place of work or place of the alleged infringement, in Hungary with the National Authority for Data Protection and Freedom of Information.

Contact details of the National Authority for Data Protection and Freedom of Information: postal address: 1363 Budapest, Pf. 9., telephone: +36 (1) 391-1400, e-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu

In addition to filing a complaint, the data subject may also take legal action against the unlawful processing of his or her personal data or the infringement of his or her rights related to his or her right to information self-determination.

In Hungary, the lawsuit may be brought before the competent court of the place of residence or domicile of the data subject, or, based on the seat of the data controller, before the Székesfehérvár Court (seat: 8000 Székesfehérvár, Dózsa György út 1.; postal address: 8002 Székesfehérvár, Pf. 251.).

If the person is habitually resident in another EU country, he or she can also bring the case in the courts of the Member State of habitual residence.

Sárszentmihály, 15 December 2023.

Masterplast Complaints Handling Group